08-12-05

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Attn: Mr. Behrooz Senfi, Art Unit 2613
Commissioner of Patents and Trademarks
Washington, D.C. 20231

August 07, 2005

Dear Mr. Senfi:

This communication is in regard to Patent Application Serial No. 10/006,444 entitled "Optimizations for Live Event, Real-time, 3D Object Tracking."

In response to your Office Action dated March 11, 2005, and in preparation for my upcoming visit to your office, I present the following draft arguments as to why I believe Jain et al does not disclose my invention as either specified or claimed. Enclosed please find my check number 1306 for $510.00 covering the three month extension fee.

First, as a matter of background, my claim one elaborates four key elements to my invention. Specifically, they are:

1. "a fixed area tracking matrix";
2. "a first algorithm... responsive to the fixed area tracking matrix for determining the (X, Y) location of each object";
3. "a movable volume tracking matrix responsive to the determined (X, Y) locations for controllably detecting the motion of each object in (X, Y, Z) space, and";
4. "a second algorithm operated on the computer system responsive to the movable volume tracking matrix for determining the (X, Y, Z) dimensional characteristics of each object and for forming a database representative of each object's locations, movements and dimensional characteristics."

Before discussing the actual specified definition of these individual elements, I would first like to offer what I see to be a description of Jain's teachings *in the language of my patent*, as a comparison. Specifically:

1. "a number of fixed volume tracking cameras, each at a different spatial perspective";
2. "a first algorithm responsive to each camera for determining the (X, Y) dimensional characteristics of each object and for forming a database per camera of each object's location, movements and dimensional characteristics";
3. "a second algorithm responsive to the databases formed by the first algorithm for combining the multiple two dimensional images and their accompanying object information, into a three-dimensional video database."

With respect to my first element of "a fixed area tracking matrix" versus Jain's "a number of fixed volume tracking cameras, each at a different spatial perspective" I believe that the following distinctions are evident: